



DEC 20 2004

Food and Drug Administration  
College Park, MD

Scott J. Grare  
Senior Regulatory Coordinator  
Product Assurance and Regulatory Affairs  
National Starch and Chemical Company  
10 Finderne Avenue  
P.O. Box 6500  
Bridgewater, New Jersey 08807-0500

Re: Docket No. 2004P-0293/CP 1

Dear Mr. Grare:

This letter is in response to your citizen petition, dated July 8, 2004, requesting the Food and Drug Administration (FDA) to amend Title 21 of the Code of Federal Regulations (21 CFR) Section 101.9(c)(6), with respect to the declaration of "Total carbohydrate" in the nutrition labeling of food.

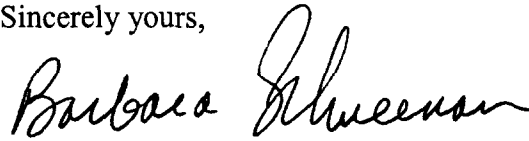
In accordance with 21 CFR 10.30(e)(2), this letter is to advise you that we have not been able to reach a decision on your petition within the first 180 days of its receipt. However, as you may be aware, FDA has received several petitions requesting the agency to establish regulations and/or provide guidance on the use of carbohydrate content claims and carbohydrate-related statements in food labeling. In response to these petitions, FDA is currently engaged in rulemaking to provide for the use of carbohydrate claims and related statements in food labeling. We will address the issues raised in your petition in an advance notice of proposed rulemaking (ANPRM), which is an "A" list item in the CFSAN 2005 Program Priorities (see item 2.1.1 c; <http://www.cfsan.fda.gov/~dms/cfsand04.html>). We encourage you to respond to the agency's request for comment when the ANPRM is published in the Federal Register.

2004P-0293

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Should you have additional questions, do not hesitate to contact us.

Sincerely yours,

A handwritten signature in black ink, reading "Barbara O. Schneeman". The signature is fluid and cursive, with the first name "Barbara" being more prominent and the last name "Schneeman" following in a similar style.

Barbara O. Schneeman, Ph.D.

Director

Office of Nutritional Products, Labeling  
and Dietary Supplements

Center for Food Safety  
and Applied Nutrition